

### III. REMARKS

#### Claims 1-33

Claims 1-33 stand rejected as being unpatentable over the combination of Leskela et al in view of Manasevit et al. Applicant respectfully traverses the rejection of these claims.

To establish a prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested in the prior art. MPEP 2143.03. Applicant respectfully submits that Leskela and Manasevit do not disclose, alone or in combination, a method of growing thin films which includes (i) "feeding inactive gas from the inactive gas source into the first conduit via a second conduit that is connected to the first conduit at a first connection point so as to create a gas phase barrier between the repeated alternating pulses of the first reactant entering the reaction chamber" and (ii) "withdrawing the inactive gas from said first conduit via a third conduit connected to the first conduit at a second connection point" as recited in Claim 1. As explained in the specification on page 5 lines 15-29, this method advantageously permits pulsing of reactants while reducing the need for moving parts. As such, Applicant submits that Claim 1 is in condition for allowance.

Claims 2-32 are also in condition for allowance because they depend upon allowable Claim 1 and recite additional patentable subject matter.

Please note that Applicant has amended Claim 1 to correct a typographical error.

#### Claims 34-58

Claims 34-58 also stand rejected as being unpatentable over the combination of Leskela et al in view of Manasevit et al.

Applicant respectfully traverses the rejection of these claims. Nevertheless, to advance prosecution, Applicant has amended Claim 34 to further define the invention. Specifically, Claim 34 now recites, in part, an apparatus for growing thin films comprising "a hot zone in which the reaction chamber and the first conduit are positioned" and "a control valve for controlling the flow of the first reactant into the first conduit, the control valve being positioned outside the hot zone." Leskela and Manasevit do not disclose, either alone or in combination, an

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apparatus for growing thin film with the above noted limitations. For at least this reason, Applicant respectfully submits that Claim 34 is in condition for allowance.

Claims 35-58 are also in condition for allowance because they depend upon allowable Claim 34 and they recite additional patentable subject matter.

#### New Claims

Applicant has added new Claims 59-67. Claims 59-63 are in condition for allowance because they depend upon allowable Claim 34 and they recite additional patentable subject matter. Independent Claim 64 recites, in part, an apparatus for growing thin films that includes "a control valve for controlling the flow of the first reactant into the first conduit" wherein "the control valve being positioned in the second conduit" which "connects the first conduit to the inactive gas source at a first connection point." The cited references do not disclose, either alone or in combination, an apparatus for growing thin films with the above noted features. For at least this reason, Applicant submits that Claim 64 is in condition for allowance. Claims 65-67 are also in condition for allowance because they depend upon allowable Claim 64 and they recite additional patentable subject matter.

#### CONCLUSION

The undersigned has made a good faith effort to respond to all of the rejections in the case and to place the claims in condition for immediate allowance. Nevertheless, if any undeveloped issues remain or if any issues require clarification, the Examiner is respectfully requested to call Applicant's attorney in order to resolve such issue promptly.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

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By: Rabinder N. Narula  
Rabinder N. Narula  
Registration No. P-53,371  
Attorney of Record  
2040 Main Street  
Fourteenth Floor  
Irvine, CA 92614  
(949) 760-0404

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